

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

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SOVEREIGN BANCORP, INC., et al.)	Civil Action No. 04-11631-EFH
)	
Plaintiffs,)	
)	
vs.)	
)	
JOHN H. HARLAND COMPANY,)	
)	
Defendant.)	
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**JOINT STATEMENT
PURSUANT TO LOCAL RULE 16.1**

Pursuant to Local Rule 16.1, the parties in the above action submit this Joint Statement in advance of the scheduling conference set for October 6, 2004 at 2:00 p.m.

I. Statement Pursuant to Local Rule 16.1(B)

Counsel for the parties herein state that they have conferred pursuant to Rule 16.1(b) for the purpose of (1) preparing an agenda of matters to be discussed at the scheduling conference; (2) preparing a proposed pretrial schedule; and (3) considering whether they will consent to trial by magistrate judge.

II. Statement Pursuant to Local Rule 16.1(C)

The parties have had settlement discussions, and have exchanged written settlement proposals, but have been unable to resolve this dispute.

III. Joint Statement Pursuant to Local Rule 16.1(D)

A. Joint Discovery Plan

1. Initial Disclosures

The parties propose that initial disclosures be made on or before November 1, 2004.

2. Close of Fact Discovery

The parties propose that all fact discovery be completed on or before April 15, 2005.

3. Expert Witnesses and Expert Discovery

The parties propose that expert witnesses, if any, be identified in accordance with Fed.R.Civ.P. Rule 26 on or before June 1, 2005, and that rebuttal experts, if any, be identified in accordance with Fed.R.Civ.P. Rule 26 on or before July 1, 2005. The parties further propose that expert depositions be completed on or before July 31, 2005.

B. Proposed Motion Schedule

The parties propose that motions for summary judgment and other dispositive motions be filed on or before September 15, 2005.

C. Proposed Pre-Trial Conference Date

The parties propose that the Court conduct a pre-trial conference in this matter on October 30, 2005, or as soon thereafter as the Court's calendar permits.

**PLAINTIFFS,
SOVEREIGN BANCORP, INC., ET AL.**

By their attorneys,

/s/ Paula S. Pliss

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